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*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
EDWARS Y. FALCON-VEGA, )  
)  
Defendant. )  
)  
\_\_\_\_\_ )

Case No.: 2:21-mj-1037-BNW

**Stipulation Requesting Case be Closed**

IT IS STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Angelica Marmorstein, Assistant United States Attorney, counsel for the United States of America, and Roger Bailey, Esquire, counsel for the defendant that the status hearing in the above-captioned matter, be closed.

This Stipulation is entered into pursuant to General Order 2007-04 and based upon the following:

1. The Defendant completed the DUI school, the Victim Impact Panel, and the Eight hour Alcohol Awareness class as required.
2. Defendant paid the \$500.00 fine as well as the \$10.00 assessment fee.
3. Defendant has completed all required conditions imposed by the Court. The parties agree to jointly move to allow the defendant to withdraw his plea of guilty to Count 1 – Operating a Motor Vehicle while Under the Influence of Alcohol.
4. The Government hereby moves, pursuant to the plea agreement to amend Count 1 of the Complaint to a charge of Reckless Driving, a violation of Title 36 C.F.R. § 4.2(b) and NRS 484B.653.

- 1           5.     The Defendant hereby pleads guilty to the Amended Count 1 of the  
2                 Complaint.  
3           6.     The parties jointly request that the original sentence be applied to the  
4                 Reckless Driving conviction.

5           DATED this 23<sup>rd</sup> day of AUGUST.

6  
7     RESPECTFULLY SUBMITTED BY:

8           /s/ Angelica Marmostein  
9     ANGELICA MARMOSTEIN  
10    Assistant United States Attorney

/s/ Roger C. Bailey  
          ROGER C. BAILEY, ESQ.  
          Attorney for Edwards Y.Falcon-Vega

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UNITED STATES OF AMERICA, )

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**Order to Close the Case**

FINDINGS OF FACT

ORDER

Based on the pending stipulation of counsels, and good cause appearing therefore, IT IS HEREBY ORDERED that the status hearing be vacated and the case be closed.

DATED this 25th day of August, 2022



UNITED STATES MAGISTRATE JUDGE